

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INTEGRATED HEALTH SERVICES  
OF CLIFF MANOR, INC., a Delaware corporation,  
INTEGRATED HEALTH SERVICES AT  
RIVERBEND, INC., a Delaware Corporation,  
INTEGRATED HEALTH SERVICES AT  
SOMERSET VALLEY, INC., A Delaware  
corporation, ALPINE MANOR, INC., a  
Pennsylvania corporation, INTEGRATED  
HEALTH GROUP, INC., a Pennsylvania  
corporation, SPRING CREEK OF IHS, INC., a  
Pennsylvania corporation, FIRELANDS OF IHS,  
INC., a Pennsylvania corporation, ELM CREEK  
OF IHS, INC., a Pennsylvania corporation, IHS  
LONG TERM CARE SERVICES, INC., a  
Delaware corporation,

Plaintiffs,

v.

THCI COMPANY LLC,

Defendant.

Civil Action No. 04-910

**DECLARATION IN OPPOSITION TO PRELIMINARY INJUNCTION MOTION**

**AMOS ALTER** declares:

1. I am of counsel to Troutman Sanders LLP, New York co-counsel to plaintiffs herein. I make this Declaration in opposition to defendant's preliminary injunction motion solely in order to place before the Court on this motion the complaint (Exh. "A"), answer (Exh. "B"), and reply (Exh. "C") in this action. The reasons why this absolutely

frivolous motion should be denied are set forth in the accompanying Memorandum of Law in Opposition.

2. I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on July 19, 2005.

A handwritten signature in black ink, appearing to read 'A. Alter', is written over a horizontal line.

Amos Alter